

JAP:ZA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-09-1274

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UNITED STATES OF AMERICA

COMPLAINT

- against -

FNU LNU,

(18 U.S.C. § 1542)

also known as

"Roberto Carrasquillo Rivera,"

"Anibal Luna Alvarado,"

"Eddie Cruz" and

"Raymond Rodriguez,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Christian Contreras, being duly sworn, deposes and says that he is an Enforcement Officer with Customs and Border Protection, duly appointed according to law and acting as such.

On or about December 29, 2009, within the Eastern District of New York, the defendant, FNU LNU, also known as "Roberto Carrasquillo Rivera," "Anibal Luna Alvarado," "Eddie Cruz," and "Raymond Rodriguez," did willfully and knowingly use and attempt to use a passport the issue of which was secured in any way by reason of false statement, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the

grounds for his belief are as follows:^{1/}

1. I am an Enforcement Officer with Customs and Border Protection ("CBP"). I am familiar with the facts and circumstances set forth below from my personal involvement in this joint CBP/Department of State investigation, from my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about December 29, 2009, the defendant, FNU LNU, arrived at John F. Kennedy International Airport from Santo Domingo, Dominican Republic. The defendant presented a United States passport for inspection issued in the name of "Roberto Carrasquillo Rivera" which stated that he was born on October 5, 1968, in Puerto Rico.

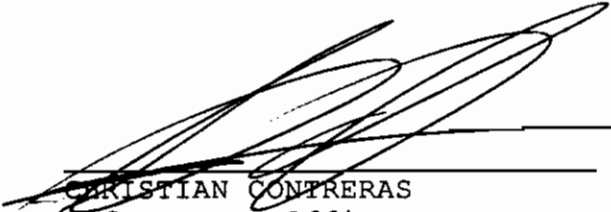
3. CBP officers submitted the defendant's fingerprints to the FBI, and the fingerprint comparison results revealed that the defendant had previously been arrested under three different names. He was arrested on April 6, 1988 under the name "Eddie L. Cruz"; on April 5, 1995 under the name "Raymond Rodriguez"; on December 12, 2003 under the name "Anibal L. Alvarado"; and on October 10, 2008 under the name "Roberto Carrasquillo."

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

4. The defendant was interviewed by CBP officers. He provided the officers with the names of his wife and his two children. CBP officers entered his children's name into a State Department database and located their United States passports. The officers showed the defendant the pictures of the children from their passports and he confirmed that those were his children. The passport applications for both children listed their father as "Anibal Luna." When CBP officers asked the defendant why that name was listed rather than the name on his passport, "Roberto Carrasquillo," he did not reply.

5. CBP officers obtained two United States passport applications for an individual named "Anibal Luna Alvarado." The photograph of the applicant contained in those applications matches that of the defendant.

WHEREFORE, your deponent respectfully requests that the defendant FNU LNU, also known as "Roberto Carrasquillo Rivera," "Anibal Luna Alvarado," "Eddie Cruz," and "Raymond Rodriguez," be dealt with according to law.



CRISTIAN CONTRERAS
Enforcement Officer
Customs and Border Protection

Sworn to before me this
31th day of December, 2009



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